

## U.S. Department of Justice

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

December 3, 2013

By Hand Hon. Colleen McMahon United States District Judge United States Courthouse 500 Pearl Street New York, NY 10007 DOCUM 12 12 13

Re: United States v. Sandeep Aggarwal, 13 Cr. 884

## MEMO ENDORSED

Dear Judge McMahon:

The Government writes to propose a revised bail package, on consent, in the above-captioned matter. The proposed package would increase the bail security in contemplation of a trip planned by the defendant to India, to which the Government does not object under these new proposed bail conditions.

At present, the defendant is at liberty on a \$500,000 personal recognizance bond signed by two financially responsible persons and secured by \$50,000 cash. The parties jointly propose that (1) the bond amount be increased to \$1,000,000, (2) that it be signed by three financially responsible persons rather than two, and that (3) it be secured by \$250,000 in cash or property. Upon the issuance of a new bond, the posting of \$250,000, and the signature of at least two of the three financially responsible persons, the defendant would be allowed to obtain his passport from Pretrial Services and travel to India provided that he return by January 15, 2014 and upon return surrender his passport once more. The purpose of the proposed trip is to enable the defendant to see his children, wife and other family in India before returning to the United States,

The third financially responsible person, the defendant's wife, a signer of the original bond, would be required to sign the new bond in India if practicable or upon her return to the United States.

where the defendant continues to cooperate in ongoing investigations. The parties are of course able to provide more information at the Court's request.

Respectfully submitted,

PREET BHARARA United States Attorney

By:

Arlo Devlin-Brown

Assistant United States Attorney

(212) 637-2506

SO ORDERED

Hon. Colleen McMahon United States District Judge

Dated:

cc: Sean Casey, Esq. counsel for defendant